

Debtor 1 Henry James McGuigan

Debtor 2 Kendra Suzann McGuigan  
(Spouse, if filing)

United States Bankruptcy Court for the: Eastern District of PA  
(State)

Case number 19-16870-amc

## Form 4100R

## Response to Notice of Final Cure Payment

10/15

According to Bankruptcy Rule 3002.1(g), the creditor responds to the trustee's notice of final cure payment.

## Part 1: Mortgage Information

Name of creditor: Fay Servicing, LLC Court claim no. (if known): 3-1

Last 4 digits of any number you use to identify the debtor's account: 2776

Property address: 4327 Manayunk Avenue

Number Street

Philadelphia PA 19128

City State ZIP Code

## Part 2: Prepetition Default Payments

Check one:

- ☒ Creditor agrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim.
- ☐ Creditor disagrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim. Creditor asserts that the total prepetition amount remaining unpaid as of the date of this response is: \$ \_\_\_\_\_

## Part 3: Postpetition Mortgage Payment

Check one:

- ☐ Creditor states that the debtor(s) are current with all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

The next postpetition payment from the debtor(s) is due on:      /      /     

MM / DD / YYYY

- ☒ Creditor states that the debtor(s) are not current on all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

Creditor asserts that the total amount remaining unpaid as of the date of this response is:

- a. Total postpetition ongoing payments due: (a) \$ 2,112.91
- b. Total fees, charges, expenses, escrow, and costs outstanding: + (b) \$ 1,400.00\*
- c. **Total.** Add lines a and b. (c) \$ 3,512.91

Creditor asserts that the debtor(s) are contractually obligated for the postpetition payment(s) that first became due on:

12 / 01 / 2024

MM / DD / YYYY

\* PPFN filed 02/24/2020 IAO \$1,400.00

Debtor 1 Henry James McGuigan Case number (if known) 19-16870-amc  
First Name Middle Name Last Name

**Part 4:** Itemized Payment History

If the creditor disagrees in Part 2 that the prepetition arrearage has been paid in full or states in Part 3 that the debtor(s) are not current with all postpetition payments, including all fees, charges, expenses, escrow, and costs, the creditor must attach an itemized payment history disclosing the following amounts from the date of the bankruptcy filing through the date of this response:

- ☐ all payments received;
- ☐ all fees, costs, escrow, and expenses assessed to the mortgage; and
- ☐ all amounts the creditor contends remain unpaid.

**Part 5:** Sign Here

**The person completing this response must sign it. The response must be filed as a supplement to the creditor's proof of claim.**

Check the appropriate box::

- ☐ I am the creditor.
- ☒ I am the creditor's authorized agent.

**I declare under penalty of perjury that the information provided in this response is true and correct to the best of my knowledge, information, and reasonable belief.**

Sign and print your name and your title, if any, and state your address and telephone number if different from the notice address listed on the proof of claim to which this response applies.

X /s/Lauren Moyer  
Signature

Date 12 / 04 / 2024

Print Lauren Moyer  
First Name Middle Name Last Name

Title Creditor's Attorney

Company Friedman Vartolo LLP

**If different from the notice address listed on the proof of claim to which this response applies:**

Address 1325 Franklin Avenue, Suite 160  
Number Street

Garden City NY 11530  
City State ZIP Code

Contact phone (212) 471 - 5100

Email bankruptcy@friedmanvartolo.com

Pmt Due/Comments	Amt Due	Date Received	Amt Rec'd	Pmt Satisfied	To/From Suspense	Suspense Balance
Begin Suspense					\$ -	\$ -
					\$ -	\$ -
					\$ -	\$ -
	\$2,081.07	11/29/2019	\$2,081.07	12/1/2019	\$ -	\$ -
	\$2,081.07	1/2/2020	\$2,081.07	1/1/2020	\$ -	\$ -
	\$2,081.07	1/31/2020	\$2,081.07	2/1/2020	\$ -	\$ -
	\$2,081.07	3/3/2020	\$2,081.07	3/1/2020	\$ -	\$ -
	\$2,081.07	4/1/2020	\$2,081.07	4/1/2020	\$ -	\$ -
	\$2,081.07	5/1/2020	\$2,081.07	5/1/2020	\$ -	\$ -
	\$2,081.07	6/2/2020	\$2,081.07	6/1/2020	\$ -	\$ -
	\$2,081.07	7/6/2020	\$2,081.07	7/1/2020	\$ -	\$ -
	\$2,081.07	8/6/2020	\$2,081.07	8/1/2020	\$ -	\$ -
	\$2,081.07	9/8/2020	\$2,081.07	9/1/2020	\$ -	\$ -
	\$2,081.07	10/2/2020	\$2,081.07	10/1/2020	\$ -	\$ -
	\$2,081.07	11/13/2020	\$2,081.07	11/1/2020	\$ -	\$ -
	\$2,081.07	12/11/2020	\$2,081.07	12/1/2020	\$ -	\$ -
	\$2,081.07	1/14/2021	\$2,081.07	1/1/2021	\$ -	\$ -
	\$2,138.86	2/15/2021	\$2,138.86	2/1/2021	\$ -	\$ -
	\$2,138.86	3/10/2021	\$2,138.86	3/1/2021	\$ -	\$ -
	\$2,138.86	4/1/2021	\$2,138.86	4/1/2021	\$ -	\$ -
	\$2,138.86	5/14/2021	\$2,138.86	5/1/2021	\$ -	\$ -
	\$2,138.86	6/10/2021	\$2,138.86	6/1/2021	\$ -	\$ -
	\$2,138.86	7/8/2021	\$2,138.86	7/1/2021	\$ -	\$ -
	\$2,138.86	8/5/2021	\$2,138.86	8/1/2021	\$ -	\$ -
	\$2,138.86	9/15/2021	\$2,138.86	9/1/2021	\$ -	\$ -
	\$2,138.86	10/14/2021	\$2,138.86	10/1/2021	\$ -	\$ -
	\$2,138.86	11/12/2021	\$2,138.86	11/1/2021	\$ -	\$ -
	\$2,138.86	12/10/2021	\$2,138.86	12/1/2021	\$ -	\$ -
	\$2,138.86	1/11/2022	\$2,138.86	1/1/2022	\$ -	\$ -
	\$2,174.73	2/15/2022	\$2,174.73	2/1/2022	\$ -	\$ -
	\$2,174.73	3/15/2022	\$2,174.73	3/1/2022	\$ -	\$ -
	\$2,174.73	4/14/2022	\$2,174.73	4/1/2022	\$ -	\$ -
	\$2,174.73	5/13/2022	\$2,174.73	5/1/2022	\$ -	\$ -
	\$2,174.73	6/9/2022	\$2,174.73	6/1/2022	\$ -	\$ -
	\$2,174.73	7/11/2022	\$2,174.73	7/1/2022	\$ -	\$ -
	\$2,174.73	8/5/2022	\$2,174.73	8/1/2022	\$ -	\$ -
	\$2,174.73	9/15/2022	\$2,174.73	9/1/2022	\$ -	\$ -
	\$2,174.73	10/12/2022	\$2,174.73	10/1/2022	\$ -	\$ -
	\$2,174.73	11/10/2022	\$2,174.73	11/1/2022	\$ -	\$ -
	\$2,174.73	12/9/2022	\$2,174.73	12/1/2022	\$ -	\$ -
	\$2,174.73	1/6/2023	\$2,174.73	1/1/2023	\$ -	\$ -
	\$2,068.53	2/3/2023	\$2,068.53	2/1/2023	\$ -	\$ -
	\$2,068.53	3/7/2023	\$2,068.53	3/1/2023	\$ -	\$ -
	\$2,068.53	4/13/2023	\$2,068.53	4/1/2023	\$ -	\$ -
	\$2,068.53	5/11/2023	\$2,068.53	5/1/2023	\$ -	\$ -

Debtor name: McGuigan

### Post Petition Payment Ledger

[illegible]

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA

IN RE: Henry James McGuigan Kendra Suzann McGuigan Debtor(s)	CASE NO.: 19-16870-amc
Fay Servicing, LLC as servicer for Fay Servicing, LLC v.	CHAPTER 13
Henry James McGuigan Kendra Suzann McGuigan Kenneth E. West Respondents	Judge: Ashely M. Chan  Hearing Date:  Objection Deadline:

**CERTIFICATE OF SERVICE**

I certify under penalty of perjury that I caused to be served the above-captioned pleading on the parties at the addresses specified below or on the attached list on December 4, 2024.

The type(s) of service made on the parties (first-class mail, electronic notification, hand delivery, or another type of service) was: first-class mail and electronic notification

If more than one method of service was employed, this certificate of service groups the parties by the type of service. For example, the full name, email address, and where applicable the full name of the person or entity represented, for each party served by electronic transmission is listed under the heading "Service by NEF," and the full name and complete postal address for each party served by mail are listed under the heading "Service by First-Class Mail."

EXECUTED ON: December 4, 2024

By: /s/Lauren Moyer  
Lauren Moyer, Esq.  
**FRIEDMAN VARTOLO LLP**  
Attorneys for Fay Servicing, LLC as servicer for  
Fay Servicing, LLC  
1325 Franklin Avenue, Suite 160  
Garden City, NY 11530  
T: (212) 471-5100  
F: (212) 471-5150  
[Bankruptcy@FriedmanVartolo.com](mailto:Bankruptcy@FriedmanVartolo.com)

**Service by Regular Mail**

Henry James McGuigan  
4327 Manayunk Avenue  
Philadelphia, PA 19128  
Bankruptcy Debtor

Kendra Suzann McGuigan  
4327 Manayunk Avenue  
Philadelphia, PA 19128  
Bankruptcy Debtor

**Service by NEF**

Brad J. Sadek  
1500 JFK Boulevard, Ste 220  
Philadelphia, PA 19102  
Attorney

Kenneth E. West  
Office of the Chapter 13 Standing Trustee  
190 N. Independence Mall West  
Suite 701  
Philadelphia, PA 19106  
Bankruptcy Trustee

United States Trustee  
Robert N.C. Nix Federal Building - Suite 320, 900 Market  
Street Philadelphia, PA 19107  
United States Trustee